

THE HONORABLE ROBERT J. BRYAN

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOSEPH LOCHRIDGE,

Plaintiff,

vs.

CITY OF TACOMA, DEPARTMENT
OF PUBLIC UTILITIES, TACOMA
RAIL, a municipal corporation,

Defendants.

NO. 3:14-cv-05053-RJB

DEFENDANTS' DISCLOSURE OF
PRIMARY EXPERT WITNESS
WILLIAM B. SKILLING

COME NOW the Defendants City of Tacoma, Department of Public Utilities,
Tacoma Rail, by and through their undersigned attorneys, and by way of disclosure
pursuant to FRCP 26(a)(2)(B), disclose the following primary expert witness:

William B. Skilling
William B. Skilling & Company
3814 East Lee Street
Seattle, WA 98112
(206) 622-2626

Mr. Skilling, if called, is expected to testify and provide his opinion that the
Plaintiff has vocational options that would provide him with income comparable to his

1 income from Tacoma Rail, that locomotive engineer positions are currently available
 2 locally and nationwide; however, the Plaintiff has not conducted a diligent search for
 3 comparable employment. Mr. Skilling is also expected to testify concerning the
 4 Plaintiff's alternative career as Journey Level Industrial Painter (the compensation
 5 rate of \$37.80 per hour), and benefits that occupation can provide. Mr. Skilling is
 6 expected to testify that had the Plaintiff conducted a reasonably diligent search for
 7 comparable employment, he would have been successful in less than six months
 8 following the termination of his employment at Tacoma Rail. Mr. Skilling's opinions
 9 are contained in his detailed report. Mr. Skilling's fee is \$265 per hour for services
 10 and \$365 per hour for testimony.
 11

12 Attached as Exhibit 1 is the report authored by Mr. Skilling that expresses his
 13 opinions in this matter, a copy of his curriculum vitae, a list of prior cases in which he
 14 has testified, and his fee structure.

15 DATED this 21 day of November, 2014.

16 ELIZABETH A. PAULI, City Attorney

17 By: 

18 M. JOSEPH SLOAN, WSBA #13206
 19 Deputy City Attorney
 20 Tacoma Public Utilities
 21 3628 South 35th Street
 22 Tacoma, WA 98409-3192
 23 Joseph.Sloan@cityoftacoma.org

24 STINSON LEONARD STREET
 25 Tracey Holmes Donesky, #302727
 150 South Fifth Street, Suite 2300
 Minneapolis, MN 55402

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2014, I electronically filed, through my staff, the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record on file:

James K. Vucinovich, WSBA #29199
1000 Second Avenue, Suite 1610
Seattle, WA 98104
Email: jvucinovich@rvflegal.com

Stephen A. Teller, WSBA #23372
Sara B. Amies, WSBA #36636
1139 34th Avenue, Suite B
Seattle, WA 98122
Email: steve@stellerlaw.com
Email: sara@stellerlaw.com

DATED this 24 day of November, 2014, in Tacoma, Pierce County,
Washington.



M. JOSEPH SLOAN, WSBA#13206

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2014, I mailed a copy of the attached *Defendants' Disclosure of Primary Expert Witness William B. Skilling*, to the attorneys of record at the following addresses:

James K. Vucinovich, WSBA #29199
1000 Second Avenue, Suite 1610
Seattle, WA 98104

Stephen A. Teller, WSBA #23372
Sara B. Amies, WSBA #36636
1139 34th Avenue, Suite B
Seattle, WA 98122

DATED this 24th day of November, 2014, in Tacoma, Pierce County, Washington.



Diane M. Kubicek
Paralegal
City of Tacoma

EXHIBIT 1

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DEFENDANTS' DISCLOSURE OF PRIMARY
EXPERT WITNESS WILLIAM B. SKILLING Page 5 of 5
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